

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	CRIMINAL NO. <u>CR-1-01-058</u>
	:	(Honorable Susan J. Dlott)
Plaintiff,	:	
-vs-	:	
JOHN F. YEAGER,	:	
Defendant.	:	

**DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO SUBMIT OBJECTIONS TO THE PRESENTENCE REPORT**

Now comes Defendant, John Yeager, and respectfully moves this Court for additional time to submit objections to the Presentence Investigation Report, which are currently due on March 14, 2005. Both attorneys who are working on this case have been out of town for several days during the last two weeks. Because of the extensive travel and their day to day case load, they have not been able to prepare meaningful objections to the PSR. Mr. Pinales has spoken with opposing counsel, who has indicated that he does not object to an extension. In fact, there are issues that counsel would like to discuss with each other before Defendant submits objections to the PSR. Undersigned counsel has also notified the probation officer about this motion. Accordingly, a two-week extension to submit objections to the PSR is requested.

Respectfully submitted,

SIRKIN, PINALES & SCHWARTZ LLP

/s/ Candace C. Crouse

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was delivered to William Hunt, Assistant U.S. Attorney, 220 Potter Stewart Courthouse, 100 East Fifth Street, Cincinnati, Ohio 45202, Attorney for Plaintiff, this 10th day of March 2005 via electronic mail.

/s/ Candace C. Crouse
CANDACE C. CROUSE

Attorney for Defendant